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16 *ALBERTSON'S, LLC.*

**UNITED STATES DISTRICT COURT
STATE OF NEVADA**

13 MARIETTA VALLEN, an individual,
14 Plaintiff,
15 vs.
16 ALBERTSON'S LLC., a Foreign Limited-
17 Liability Company; CHRISTENSEN
18 DEVELOPMENT, LP, a Foreign Limited
Partnership; TRAILS VILLAGE CENTER
19 COMPANY, an unregistered Domestic
Corporation dba TRAILS VILLAGE
20 CENTER; DOES 1-20 and ROE BUSINESS
21 ENTITIES 1-20, inclusive,
22 Defendants.

CASE NO.: 2:24-cv-2155-RFB-EJY

**STIPULATED AND ORDER TO
EXTEND DISCOVERY DEADLINES
(FIRST REQUEST)**

Pursuant to Local Rules 26-3, the parties respectfully submit the following stipulation to extend the discovery deadlines in this matter by ninety (90) days.

A. A Statement Specifying the Discovery Completed (LR 26-3(a):

1. Plaintiff has made her initial disclosures pursuant to Fed. R. Civ. P. 26(a);
2. Defendant Albertson's LLC have made their initial disclosures and supplemental disclosures pursuant to Fed. R. Civ. P. 26(a);

- 1 3. Defendants Christensen Development, LP and Trails Village Center Company
- 2 have made their initial disclosures and supplemental disclosures pursuant to Fed.
- 3 R. Civ. P. 26(a);
- 4 4. Defendant Albertson's LLC has served written discovery on Plaintiff;
- 5 5. Defendants Christensen Development, LP and Trails Village Center Company
- 6 have served written discovery on Plaintiff; Plaintiff has responded to Defendant
- 7 Albertson's LLC's written discovery;
- 8 7. Plaintiff has responded to Defendants Christensen Development, LP and Trails
- 9 Village Center Company's written discovery;
- 10 8. Plaintiff has served written discovery to Defendant Albertson's LLC;
- 11 9. Plaintiff has served written discovery to Defendants Christensen Development,
- 12 LP and Trails Village Center Company;
- 13 10. Defendants Christensen Development, LP and Trails Village Center Company
- 14 have responded to Plaintiff's written discovery;
- 15 11. Plaintiff has served written discovery to Defendant Albertson's LLC; and
- 16 12. Defendant Albertson's LLC has responded to Plaintiff's written discovery.

17 **B. A Specific Description of the Discovery that Remains to be Completed (LR**

18 **26-3(b):**

- 19 1. Plaintiff's deposition (currently scheduled for March 5, 2025);
- 20 2. The deposition(s) of Albertson's LLC's employee(s) Stephen Yoli and Jennifer
- 21 Fargnoli;
- 22 3. The deposition of Defendants' Rule 30(b)(6) witness(es);
- 23 4. Rule 34 Site Inspection of Defendants' premises;
- 24 5. Disclosure of expert witnesses and rebuttal expert witnesses;
- 25 6. Expert and treating physician depositions; and
- 26 7. Deposition Duces Tecum of the two contractors that performed maintenance of
- 27 the parking.

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1 C. The Reasons why the Deadline was not Satisfied or the Remaining
 2 Discovery was not Completed within the Time Limits set by the Discovery
 3 Plan (LR 26-3(c)):

4 Following removal, the parties litigated the potential for removal. The parties diligently
 5 conducted discovery while this motion was pending, but due to that delay along with counsel's
 6 schedules, depositions currently cannot be scheduled in time to meet the current initial expert
 7 disclosure deadline. In addition, Plaintiff needs to conduct additional discovery as to the location
 8 where the subject incident took place and the responsibility among the Defendants for the area
 9 where the subject incident took place, including employee and Rule 30(b)(6) depositions and a
 10 site inspection, before she will be able to designate an expert on liability. The parties believe that
 11 good cause exists to extend the discovery deadlines in this matter as they have been working
 12 diligently in the discovery process and have not delayed it with the exception of being unable to
 13 schedule depositions. Further, all of the discovery dates the parties wish to extend are more than
 14 twenty-one (21) days from the submission of this Stipulation and Order.

15 D. A Proposed Schedule for Completing all Remaining Discovery (LR 26-
 16 3(d)):

	<u>Current Deadlines:</u>	<u>Proposed Deadline:</u>
18 Amend Pleadings:	February 18, 2025	Closed
19 Initial Expert Disclosure:	March 20, 2025	June 16, 2025
20 Rebuttal Expert Disclosure:	April 18, 2025	July 16, 2025
21 Discovery Cut-off:	May 19, 2025	August 15, 2025
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28 ...		

1 Dispositive Motions: June 18, 2025 September 12, 2025
2 Joint Pre-Trial Order: July 18, 2025 October 11, 2025
3
4 DATED this 13th day of February, 2025. DATED this 13th day of February, 2025.
5

6 **BRANDON | SMERBER LAW FIRM**

7 /s/ *Ryan Venci, Esq.*

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16 *Attorneys for Defendant,*

17 *ALBERTSON'S LLC*

18 DATED this 13th day of February, 2025

19 **OLSON CANNON & GORMLEY**

20 /s/ *Stephanie Zinna, Esq.*

21 **STEPHANIE ZINNA, ESQ.**

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25 *Attorneys for Defendants,*

26 *CHRISTENSEN DEVELOPMENT, LP and*

27 *TRAILS VILLAGE CENTER COMPNAY dba*

28 *TRAILS VILLAGE CENTER*

22 **ORDER**

23 **IT IS SO ORDERED**

24 DATED this 13th day of February, 2025.

25 
26 **UNITED STATES MAGISTRATE JUDGE**
27 **HONORABLE ELAYNA J. YOUCRAH**